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**U.S. EPA COMMENTS ON THE ADDENDUM TO
THE SOUTH PLUME EE/CA**

11/07/91

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ENCLOSURE
OU5**

Enclosure 3

U.S. EPA Comments on the Addendum
to the South Plume EE/CA

Commenting Organization: U.S. EPA

Comment #1:

General: [A] The addendum should clearly present the locations of manholes 175, 177 and 177B. [B] In addition, the EE/CA should clearly state that the uranium concentration from the South Plume and from the facility will be measured separately. This is required to establish that the "equivalent mass" concept is actually being achieved.

Response:

[A] Agreed

[B] The agreement made in the South Plume Dispute Resolution was to remove a greater than equivalent mass of uranium from an existing FEMP discharge so that the mass of uranium currently discharged is not exceeded, but is reduced to a level not to exceed 1700 pounds per year. The FEMP intends to continue monitoring the Manhole 175 stream and add to it the monitoring of the Part 2 discharge line to verify meeting the 1700 pounds per year. It is not felt that the EE/CA needs to be any more explicit than to state that the 1700 pounds per year will be monitored for. The details of this monitoring will be explained in a revised Parts 2/3 Work Plan.

Action:

[A] Figure 3 was added to present the locations of manholes 175, 176 and 176B (note draft incorrectly noted these as manholes 177 & 177B). The text was also revised to clarify that the effluent line will only be replaced downstream from the tie-in of the part 2 pipeline.

[B] The text was revised (1st Page, 3rd Sentence) to indicate that the mass of uranium discharged will not exceed 1700 pounds per year.

Comment #2:

General: U.S. DOE should analyze the effect of the changes to the EE/CA on the requirements for public comment under the National Contingency Plan.

Response:

Pursuant to the National Contingency Plan, an EE/CA document should be made available to the public for comment at an information repository that contains the administrative record file for that particular non-time critical removal action. Because of the need to prepare this addendum to

the November 1990 South Groundwater Plume Removal Action EE/CA, a 30 day public comment period will be provided. A notice of availability (NOA) to announce the comment period will be issued immediately after concurrence from U.S. EPA and OEPA. In addition, a responsiveness summary to the public comments will be issued by the DOE following the 30 day comment period and entered into the administrative record file for the South Groundwater Contamination Plume Removal Action.

Action:

A NOA will be issued in the local newspapers for the availability of the South Plume EE/CA Addendum. In addition, a responsiveness summary will be prepared by the DOE and placed in the AR File for public review.

Comment #3:

General: U.S. DOE should make sure that all changes to the document are consistent throughout the EE/CA.

Response:

Assume that you are referring to items such as that mentioned below in your Comment #4. A second review of the document was made to determine if any other inconsistencies were noted. Additional inconsistencies found were added to Attachment 1. The EE/CA Addendum has been prepared to supplement the November 1990 EE/CA and is intended to be the overriding document for any inconsistencies which may still exist.

Action:

A specific section was added to Attachment 1 to include a change on Page 5-16, Paragraph 2, 3rd Sentence. A paragraph was added to the introduction to the specific sections of the EE/CA Addendum addressing how the EE/CA Addendum has been developed to supersede the November 1990 EE/CA where any inconsistency is noted.

Comment #4:

Page 1, 3rd Paragraph: If uranium loading to the river is expected to decrease at a rate differently than indicated in the EE/CA (Page 5-16) the EE/CA must be modified to reflect the change.

Response:

The level of detail included on Page 5-16 exceeded that which was agreed to in the dispute resolution. The commitment was to keep the mass of uranium discharged below 1700 pounds per year.

Action:

A specific section modification was added to delete the section of the EE/CA in question and revise the text to read that the annual mass of

uranium discharged from the FEMP will be maintained below 1700 pounds per year.

Comment #5:

Page 1, 4th Paragraph: There should be a discussion on the need for additional treatment of the contaminated groundwater, and why it was not included as part of this portion of the removal action.

Response:

Capturing of the PRRS contaminants during the removal action phase would require the construction of facilities to address treatment of both organics and inorganics prior to discharge to the Great Miami River (the IAWWT will only address the discharge of uranium). Constructing permanent (minimum 25 year life expectancy) treatment facilities to address these contaminants in a projected discharge of 2000 gallons per minute would be a major effort. This effort would result in delaying the beginning of the pumping operation for several years.

Action:

The EE/CA Addendum has been modified to reflect the information as noted in the above response.

Comment #6:

Page 2, 2nd Paragraph: Should also indicate if any actual data has indicated the concentration of uranium above 30 ug/l.

Response:

The intent of the first sentence of this paragraph was to inform the reader that the area of known above 30 ug/l was based on actual data.

Action:

The first sentence of this paragraph was modified to reflect that the area of known above 30 ug/l is based on sampling data.

Comment #7:

Page 2, 2nd Paragraph: This paragraph should also describe the goal of Part 5, as to not only monitor portions of the contaminated groundwater plume not captured by the extraction wells, but to use the information to develop other activities that may result in the capturing of the remaining portions of the plume.

Response:

The Part 5 investigation will gather additional data that will be used to

support the final remediation selection. This information will aid in the remedial design phase for determining the optimum location for the remedial well field. In addition, Part 5 could generate data that supports the need for additional response action.

Action:

The EE/CA Addendum has been modified to state that the information obtained will be used to allow the FEMP to limit access to this water until additional response action(s) for this area can be implemented. (Section 101(25) of CERCLA defines response action to mean remove, removal, remedy, or remedial action.)

Comment #8:

Page 2, 2nd Paragraph: Since the U.S. EPA recently issued a proposed revised limit of 20 ug/l for uranium in drinking water, the change should be reflected in Section 5 of the EE/CA.

Response:

The EE/CA will not be changed to reflect the recently revised limit for uranium in drinking water. However, FEMP has agreed in Part 5 to identify the location of the 20 ug/l isopleth. The information gained will be used to allow the FEMP to limit access to this water until additional response action(s) for this area can be implemented.

Action:

None

Comment #9:

Page 2, 2nd Bullet: A discussion should be included regarding when and how the contaminant concerns will be addressed jointly between representatives of the Fernald Environmental Management Project and the Paddys Run Road Site companies.

Response:

A meeting will be scheduled in November between representatives of DOE, WEMCO, ASI/IT and the PRRS PRPs (principal responsible parties). The meeting will be used to explain the EE/CA addendum to the PRRS and kick off the possibility of combining the PRRS and DOE South Groundwater Contamination Zone 2 plume into a combined removal action.

Action:

The EE/CA addendum has been modified to reflect that these discussions will be initiated.